



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

March 19, 1998

Marvin E. Jackson, Treasurer  
McGuire, Woods, Battle & Boothe  
Federal Political Action Committee  
One James Center  
Richmond, VA 23219

Identification Number: C00225342

Reference: October Quarterly (7/1/96-9/30/96), Mid-Year (1/1/97-6/30/97) and Year  
End (7/1/97-12/31/97) Reports

Dear Mr. Jackson:

This letter is to inform you that as of March 18, 1998, the Commission has not received your response to our requests for additional information dated February 25, 1998. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Ken Davis on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosures



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

FEB 25 1998

Marvin E. Jackson, Treasurer  
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Federal Political Action Committee  
One James Center  
Richmond, VA 23219

Identification Number: C00225342

Reference: Mid-Year (1/1/97-6/30/97) and Year End (7/1/97-12/31/97) Reports

Dear Mr. Jackson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide a Schedule A to support the entry disclosed on Line 11(a)(i) of the Detailed Summary Page. All contributions from individuals/persons other than political committees aggregating in excess of \$200 per year must be itemized on Schedule A. 11 CFR §104.3(a)(2)

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

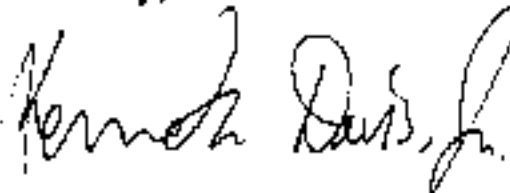
Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind

contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth A. Davis, Jr.", with a stylized, cursive script.

Kenneth A. Davis, Jr.  
Reports Analyst  
Reports Analysis Division